

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**OPERATING PERMIT 95OPDE113**  
to be issued to:

Brite-Line Technologies, Inc.  
Denver County  
Source ID 0311526

Prepared by Geoffrey Drissel  
February 7, 2003

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued April 1, 1998, and expires on April 1, 2003. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted February 12, 2002. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Source Description:

This source is classified as a manufacturer of highway marking products which falls into the Standard Industrial Classification 3069 for fabricated rubber products. Processes include a tape coating line, thermo plastic batch mixing and bagging line,

and testing equipment. The tape in the coating line is painted, covered with glass beads, oven dried, coated with glue and a release agent, oven dried again, rewound and slit to size. The mixing/bagging line mixes various dry resins and produces 50 pound bags of product.

The facility is located in northeast Denver in an area designated as attainment/maintenance for particulate matter less than 10 microns (PM<sub>10</sub>), ozone and carbon monoxide. This facility is within 100 km of a Class I area, Rocky Mountain National Park but there are no other states within 50 miles. The applicant certified that they are not a 112(r) source and are considered a minor source for New Source Review.

Under the federal Clean Air Act (the Act), EPA is charged with promulgating maximum achievable control technology (MACT) standards for major sources of hazardous air pollutants (HAPs) in various source categories by certain dates. Section 112(j) of the Act requires that permitting authorities develop a case-by-case MACT for any major sources of HAPs in source categories for which EPA failed to promulgate a MACT standard by May 15, 2002. These provisions are commonly referred to as the "MACT hammer".

Owner or operators that could reasonably determine that they are a major source of HAPs which includes one or more stationary sources included in the source category or subcategory for which the EPA failed to promulgate a MACT standard by the section 112(j) deadline were required to submit a Part 1 application to revise this operating permit by May 15, 2002. Based on the information provided by this source, Brite Line is a major source of HAPs (i.e. facility-wide potential to emit of greater than 10 tons per year of any single HAP or greater than 25 tons per year of all HAPs combined) for a covered source category (Surface Coating – Paper and Other Webs) and did submit a Part 1 application to the Division prior to May 15, 2002. As of the date of issuance of this permit, a Part 2 application to revise this operating permit is due by May 15, 2003. That date, however, may be revised. Affected facilities that fail to submit a timely and complete application will be considered in violation and such violations may be subject to enforcement action.

The facility has two construction permits, 93DE1318(mod.2) for the tape coating machine and 93DE1551(mod.1) for the thermo plastic mixer. Both of these permits are Final Approvals. Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (TPY)</u>	<u>Actual Emissions (TPY)</u>
VOC	34.6	8.84
PM	0.102	2.59X10 <sup>-4</sup>
PM <sub>10</sub>	0.097	2.59X10 <sup>-4</sup>
HAPs	34.6	4.74

(Note: the HAPs consist mostly of Toluene)

Potential emissions for VOC and PM<sub>10</sub> are as limited in the current Operating Permit, HAPs emissions are as calculated in the Title V application. Actual emissions estimates are based on AIRS data updated as of October 1996.

### III. Discussion of Modifications Made:

#### Source Requested Modifications

The source did not request any changes to the permit in their renewal application.

#### Other Modifications

Although the source did not request any changes to their permit in their renewal application, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Brite Line Renewal Operating Permit. These changes are as follows:

#### Page following Cover Page

The dates for monitoring and compliance periods have been clarified, i.e. changed "April - September" to "April 1- September 30".

Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

The citation (above "issued to" and "plant site location") on the page following the cover page provides the incorrect title for the state act. The title was changed from "Colorado Air Quality Control Act" to "Colorado Air Pollution Prevention and Control Act". In addition, the dates were removed from the citation.

Revised the Facility Contact Person.

#### Section I - General Activities and Summary

The language in Condition 1.3 was changed based on comments made by EPA on other Operating Permits.

Revised the language in Condition 3.1 to more appropriately address the PSD status of the source. In addition, based on comments made by EPA on another permit the following sentence was removed “Modifications up to this point in time have not triggered significance levels which would bring about PSD review.”

Added Section 4 that states the applicability of the Accidental Release Prevention Program (112(r)).

Added Section 5 for compliance assurance monitoring (CAM); note that no emission units are subject to CAM.

## Section II - Specific Permit Terms

### Section II.1.2: Opacity compliance language

- The language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.

## Section III – Permit Shield

- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements” and a new section 3 was added for subsumed (streamlined) conditions. Note that there were no streamlined conditions.
- Based on comments made by EPA on another permit, the following statement was added after the introductory sentence in Section 1 “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance”.
- In addition, the following phrase “In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance” was added to the end of the introductory paragraph in Section 1.
- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence “Based upon the information available to the Division and supplied by the applicant.”

## Section IV - General Conditions

- Added an “and” between the Reg 3 and C.R.S. citations in General Condition 4

(compliance requirements).

- The language contained in the Common Provisions Regulation regarding upsets was included in General Condition 3.
- The citation in General Condition 8 (fees) was changed to cite the Colorado Revised Statute. In addition, any specific identification of a fee (i.e. \$100 APEN fee) or citation of Reg 3 was removed and replaced with the language "...in accordance with the provisions of C.R.S. [appropriate citation]."
- The citation in General Condition 14 (odor) was corrected. In addition, the phrase "Part A" was added to the citation for Condition 14 (odor). Colorado Regulation No. 2 was revised and a Part B was added to address swine operations. Colorado Regulation No. 2, Part B should not be included as a general condition in the Operating Permit.
- The reference in Condition 29 (volatile organic compounds) to Regulation No. 7, Section III.C.3 was corrected to Regulation No. 7, Section VIII.C.3.
- Added the requirements in Colorado Regulation No. 7, Section V.B (disposal of volatile organic compounds) to General Condition 29.

#### Appendices

- First Page of Appendices – The phrase "except as otherwise provided in the permit" was added after the word "enforceable" in the disclaimer at the request of EPA.
- Appendix B and C were replaced with revised Appendices.
- The EPA addresses in Appendix D were corrected.